

EXHIBIT 21

PERSONAL INFORMATION REDACTED

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES

Page 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,)
PASSENGER SEXUAL ASSAULT)
LITIGATION)
_____))
) Case No.
) 3:23-md-03084-CRB(LJC)
This Document Relates to:)
Jaylynn Dean v Uber Technologies,))
Inc., et al.)
(Case No. 3:23-cv-06708))
_____)

VIDEOTAPED DEPOSITION OF HASSAN TURAY

Mesa, Arizona
July 23, 2025
5:11 p.m.

Reported by:
SHANNON STEVENSON,
RPR, CCR
Certificate No. 50461 Job No. CS7503627

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES

Page 7

1 EXAMINATION

2 BY MR. VIVES:

3 Q Hi, Mr. Turay, we briefly met off the record,
4 but my name is Michael Vives. And you understand I
5 represent Uber in this case today?

6 A Yes.

7 Q And you understand that we're here talking
8 about a lawsuit brought by a passenger who was in your
9 Uber back in November of 2023. Do you understand that?

10 A Yes.

11 Q Can you please state your full name for the
12 record.

13 A Hassan Ibrahim Turay.

14 Q Have you ever gone by any other names?

15 A No.

16 Q Can you provide us with your date of birth?

17 A [REDACTED].

18 Q So how old are you today, Mr. Turay?

19 A 51.

20 Q And what is your current address?

21 A [REDACTED]
22 [REDACTED].

23 Q Do you understand that I represent Uber and not
24 you personally?

25 A Yes.

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES

Page 14

1 anyone associated with Uber did anyone pressure you to
2 testify here today, correct?

3 A No. Yeah, that would be correct.

4 Q All right. I want to switch gears a little bit
5 and talk about your background very briefly.

6 Mr. Turay, where were you born?

7 A I was born in Sierra Leone.

8 Q And did you spend the majority of your
9 childhood in Sierra Leone?

10 A Yes, I did.

11 Q When did you immigrate to the United States?

12 A 2013.

13 Q And are you a United States citizen?

14 A Now I am, yes.

15 Q And so when you came to the U.S. in 2013, what
16 were you doing for work?

17 A I was a caregiver.

18 Q So explain that for me. What did you do as a
19 caregiver?

20 A So I worked with developmentally disabled
21 adults just helping them with activities of daily living.
22 So cooking, cleaning, administering medication, and, you
23 know, just, like, you have to sometimes -- you would have
24 to redirect them. You know, so that type of thing.

25 Q How did you get into that work?

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES

Page 77

1 Q What if they were to flirt with you or touch
2 you, would that change your mind as to whether they could
3 give consent?

4 A No.

5 MR. VIVES: Objection to form.

6 Q BY MR. PERKINS: How many Uber passengers have
7 you had sex with?

8 A That was the first one.

9 Q That was the first time?

10 A Yes.

11 Q How many Uber passengers have you reached back
12 and touched in a flirtatious manner?

13 A That was the first one.

14 Q How many Uber passengers have you flirted with
15 in the past?

16 A Maybe a couple.

17 Q A couple?

18 A Yeah.

19 Q So like two?

20 A Maybe five, maybe ten.

21 Q Five to ten?

22 A Yeah. A couple.

23 Q And when you say -- what's your definition of
24 "flirting"?

25 A Just -- you know, just like a banter that goes

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES

Page 78

1 like maybe a little bit into, you know, personal things a
2 little bit.

3 Q Like asking somebody if they've had an orgasm?

4 A Yeah. Maybe along those lines if she's talking
5 about sex, yeah.

6 Q Is that something you enjoy as an Uber driver
7 having like flirtatious conversations with those
8 passengers that you did it with?

9 A I guess you could say that, yeah.

10 Q One of the perks of the job, right?

11 A No, I wouldn't consider it a perk of the job.
12 It's just, you know -- it's just like -- I wouldn't say
13 it's one of the perks of the job.

14 Q Then why do you do it?

15 A Well, maybe it's just like, you know, I drive a
16 lot of hours, you know. Riders come in. You know,
17 sometimes you forget a little bit that you are at work.
18 You know, you talk with your riders, you know, just like
19 you would talk to anybody that you met, you know,
20 somewhere else. You know, so maybe, you know, it's kind
21 of like that, you know.

22 Q Did Uber ever tell you that you shouldn't flirt
23 with passengers?

24 A I do believe it's in the -- it's in the --
25 what's it called? In the guidelines, the rules, because,

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES

Page 118

1 lights, those were not on, correct?

2 A They were not on, no.

3 Q You were aware that at -- you didn't have a
4 camera in your car --

5 A No.

6 Q -- correct?

7 A No.

8 Q In the car that you are driving now, do you
9 have a camera?

10 A No, I don't.

11 Q And did Uber ever offer to provide you with a
12 camera that you could have in your car to be able to
13 record inside and outside of the vehicle?

14 A They did.

15 Q Did they offer to pay for it for you?

16 A No, not that type of camera. There is -- I
17 believe there was like an offer, but it's through the app
18 where you could turn on the camera on the app. I
19 remember reading about something like that, but I didn't
20 opt for it, so I don't really know exactly how it works.

21 Q I see. They didn't -- it wasn't a requirement
22 to do that, right?

23 A No, it wasn't a requirement. It was like an
24 optional thing, I believe.

25 Q Yeah. If on that night when you picked up

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES

Page 119

1 Ms. Dean there was a camera that was on in the car and
2 would have stayed on any time the ride was taking place,
3 would you have had sex with her in the car knowing it
4 would be recorded?

5 MR. VIVES: Object to the form.

6 THE WITNESS: Probably not, but I might have
7 turned off the -- because I did end the trip, so, you
8 know, if I end the trip, I don't know if that would also
9 turn off the camera. You know, it's possible if I did
10 have -- like if I opted for the camera that Uber had, if
11 I turned off, like I ended the trip, I'm assuming it
12 might also turn off the camera. I don't know. Or maybe
13 I would have to turn it off manually.

14 Q Sure.

15 A I don't.

16 Q Now at that time if you end a trip early, like
17 you are going from the pickup to the destination, but you
18 stop and end it, you can end the trip on your own in the
19 middle of it, Uber will send you a notice, correct,
20 saying it looks like your trip ended early?

21 MR. VIVES: Object to the form.

22 Q BY MR. PERKINS: Have you ever had that happen
23 before?

24 A Yes, I think so.

25 MR. VIVES: Object to the form.